

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

TQ DELTA, LLC,	)	
	)	
Plaintiff,	)	C.A. No. 13-cv-1835-RGA
	)	
v.	)	
	)	
2WIRE, INC.,	)	
	)	
Defendant.	)	
	)	

---

**STIPULATION REGARDING SCHEDULE FOR FAMILY 4 PATENTS**

In light of the current national emergency relating to COVID-19, counsel and experts for the parties, who are located across multiple states, are subject to various work, travel, and other restrictions affecting their ability to meet upcoming deadlines for the Family 4 proceedings. Accordingly, the parties hereby agree, subject to the approval of the Court, to the following revised schedule for the Family 4 patents:

Event	Current Deadline	Revised Deadline
Supplementation of Opening Expert Reports Relating to PAR Simulations for the Accused Products		Fri 5/29/2020
Supplementation of Opening Expert Reports Relating to Source Code Issues		Fri 7/31/2020
Rebuttal Expert Reports	Fri 5/29/2020	Fri 8/28/2020
Reply Expert Reports	Fri 6/19/2020	Fri 9/25/2020
Completion of Expert Depositions	Fri 7/10/2020	Fri 10/16/2020
Case Dispositive and <i>Daubert</i> Motions	Fri 7/31/2020	Fri 11/6/2020  Response briefs – Fri 11/20/2020  Reply briefs – Fri 12/4/2020

Event	Current Deadline	Revised Deadline
Joint Submission of Proposed Final, Pretrial Order, any motions in limine, voir dire, jury instructions, and special verdict forms	Fri 10/2/2020	Fri 2/5/2021
Pretrial Conference	Fri 10/9/2020 @ 9:00 am	Fri 2/12/2021 @ 9:00 am
Trial Start Date	Mon 10/19/2020 @ 9:30 am	Mon 2/22/2021 @ 9:30 am

In entering into this stipulation, the parties expressly reserve all rights to seek any further modifications to the schedule, if necessary, upon a showing a good cause.

Dated: May 21, 2020

FARNAN LLP

/s/ Michael J. Farnan

Brian E. Farnan (#4089)  
Michael J. Farnan (#5165)  
919 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 777-0300  
bfarnan@farnanlaw.com  
mfarnan@farnanlaw.com

*Attorneys for Plaintiff TQ Delta, LLC*

MORGAN LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare

Jody C. Barillare (# 5107)  
The Nemours Building  
1007 North Orange Street, Suite 501  
Wilmington, Delaware 19801  
Telephone: 302.574.3000  
Facsimile: 302.574.3001  
jbarillare@morganlewis.com

*Attorneys for Defendant 2Wire, Inc.*

**IT IS SO ORDERED**, this \_\_\_\_\_ day of May, 2020.

\_\_\_\_\_  
The Honorable Richard G. Andrews